

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

CHELSEA L. DAVIS

V.

MCKOOL SMITH P.C. ET AL

NO. 3:14-cv-4190

CHELSEA DAVIS'S NOTICE OF RULE 26 INITIAL DISCLOSURES

I hereby disclose (i) the name and, if known, the address and telephone number of each individual likely to have discoverable information—along with the subjects of that information—that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment as follows:

Each of the following persons and entities has discoverable knowledge of facts proving each element of each of my causes of action at issue that I have asserted.

1. McKool Smith P.C.
2. Gary Eden, Samuel Baxter, Thomas Graves and employees
300 Crescent Court, Ste. 1500
Dallas, TX 75201
3. Leslie Ware, Eric Tautfest and employees of The Ware Firm and PanOptis
7161 Bishop Rd., Ste. 200
Plano, TX 75024
4. Mike McKool
DALLAS, TX 75225-1650
5. William Carmody,
New York, NY 10012-2497
6. Barry Sorrels,
Dallas, TX 75201
7. Carlos Cortez,

Dallas, TX 75204-7425
8. C. Roderick Phelan,
Baker Botts LLP
2001 Ross Avenue
Dallas, Texas 75201-2980

Former colleagues and employees of Samuel Baxter from Harrison County, Texas, including his former court coordinator and secretaries when he was a judge.

Former and current female employees of The Ware Firm and McKool Smith P.C.

(ii) a copy—or a description by category and location—of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses, unless the use would be solely for impeachment;

1. Pictures, videos, emails, texts, phone records, financial records, parking receipts, hotel receipts, business records, etc. in the cloud.

(iii) a computation of each category of damages claimed by the disclosing party—who must also make available for inspection and copying as under [Rule 34](#) the documents or other evidentiary material, unless privileged or protected from disclosure, on which each computation is based, including materials bearing on the nature and extent of injuries suffered; and

| Attorney Fees | Hourly Rate | Total Hours | Lodestar |
|-------------------------------|---------------|-------------|------------|
| Chelsea L. Davis, Attorney | \$ 350.00 | 2500 | \$ 875,000 |
| Damages and Exemplary Damages | \$100,000,000 | | |

(iv) for inspection and copying as under [Rule 34](#), any insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment.

Dated: Jan. 11, 2015

Respectfully submitted,

/s/Chelsea L. Davis
Chelsea L. Davis, *pro-se*
TX BAR NO. 24059652

Mailing Address:
25 Highland Park Vlg., Ste. 100-830
Dallas, TX 75205
Telephone: (469) 426-5850
Facsimile: (469) 533-0466
cdavis@chelseadavispc.com

ADDITIONAL COUNSEL 1.

Brian M. Lidji
TX Bar No. 12329700
500 N. Akard, Suite 3500
Dallas, TX 75201
Direct 214-774-1220
Fax 214.774.1212
blidji@ldhlaw.com

Lidji Dorey & Hooper

ADDITIONAL COUNSEL 2. Goranson Bain PLLC

ANGELINE L. (“ANGIE”) BAIN and Associates
8350 N. Central Expressway, Suite 1700
Dallas, TX 75206
PHONE: 214.373.7676
Fax: 214.373.9959
TX BAR NO. 01546650

ADDITIONAL COUNSEL 3. Gray Reed & McGraw P.C. (*and* Looper Reed & McGraw)

KEN STONE
TX BAR NO. 19296300
JAMIE RIBMAN
1601 Elm Street, Suite 4600
Dallas, TX 75201
T: 214.954.4135
F: 469.320.6878
kstone@grayreed.com
jribman@grayreed.com

ADDITIONAL COUNSEL 4. Jeff Hall

Jeff Hall
2200 Ross Avenue Suite 5350
Dallas, TX 75201
214-658-6513
jthallesq@gmail.com
TX BAR NO. 00787622

ADDITIONAL COUNSEL 5. FOX ROTHSCHILD LLP

DARRELL MINTER
Two Lincoln Centre

5420 LBJ Freeway, Suite 1200
Dallas, TX 75240-6215
Tel 214-231-5711 Fax 972.404.0516
DMinter@foxrothschild.com

ADDITIONAL COUNSEL 6.

MILLER BROWN LLP

J. Robert Miller Jr.
TX Bar No. 14092500
rmiller@miller-brown.com
CHRISTY E. MADDEN
State Bar No. 90001629
cmadden@miller-brown.com
400 South Ervay Street
Dallas, Texas 75201-5513
(214) 748-7600
FAX: (214) 204-9134

ADDITIONAL COUNSEL 7.

Friedman & Feiger LLP

Lawrence J. Friedman
State Bar No. 07469300
Carlos Morales
State Bar No. 24025545
5301 Spring Valley, Suite 200
Dallas, Texas 75254
Telephone (972) 788-1400
FAX (972) 788-2667
lfriedman@fflawoffice.com

ADDITIONAL COUNSEL 8.

Gibson Dunn LLP

Veronica S. Lewis, SBN 24000092
vlewis@gibsondunn.com
William B. Dawson, SBN 05606300
wdawson@gibsondunn.com
Benjamin D. Williams, SBN 24072517
bwilliams@gibsondunn.com
Gibson Dunn LLP
2100 McKinney Avenue
Suite 1100
Dallas, TX 75201-6912
Tel: +1 214.698.3100
Fax: +1 214.571.2900

ADDITIONAL COUNSEL 9.

Abernathy, Roeder, Boyd & Joplin, P.C.

Ross Wells
1700 Redbud Boulevard, Suite 300
McKinney, TX 75069
Phone: (214) 544-4000
Fax: (214) 544-4040
rwell@abernathy-law.com

ADDITIONAL COUNSEL 10.

Figari & Davenport LLC

Don Colleluori
TX BAR NO. 04581950
A. Erin Dwyer
TX BAR NO. 06302700
3400 Bank of America Plaza
901 Main St Ste 3400
Dallas, TX 75202
Phone: 214-939-2007
FAX: 214-939-2090
don.colleluori@figdav.com
erin.dwyer@figdav.com

ADDITIONAL COUNSEL 11.

Herring & Irwin

CHARLES HERRING
cherring@herring-irwin.com

ADDITIONAL COUNSEL 12.

Baker Botts LLP

George Lamb
Calvin Roderick Phelan
2001 Ross Ave. Ste.
Dallas, TX 75201
Fax (214) 661-4659
george.lamb@bakerbotts.com
rod.phelan@bakerbotts.com

ADDITIONAL COUNSEL 13.

Trevor R. Jefferies

Arnold & Porter LLP
700 Louisiana Street, Suite 1600
Houston, Texas 77002
Telephone: +1 713-576-2403
Cell Phone: +1 713-530-8243
trevor.jefferies@aporter.com

ADDITIONAL COUNSEL 14.

Vanessa Griffith

Vinson & Elkins LLP
2001 Ross Avenue, Suite 3700
Dallas, TX 75201-2975
Tel +1.214.220.7713
Fax +1.214.999.7713
E-mail vgriffith@velaw.com

ADDITIONAL COUNSEL 15.

Jamie McKey

Kendall Law Group
jmckey@kendalllawgroup.com

ADDITIONAL COUNSEL 16.

Levi G. McCathern, II

McCathern, PLLC
3710 Rawlins St., Suite 1600
Dallas, Texas 75219

214.741.2662 Office
214.741.4717 Fax
lmccathern@mccathernlaw.com

ADDITIONAL COUNSEL 17. Lewis T. Stevens
TX24031366
131 East Exchange Ave., No. 204
Fort Worth, TX 76164
T-817-332-4466
F-817-332-4476
lstevens@lstevenslaw.com

CERTIFICATE OF SERVICE

I electronically submitted the foregoing document using the electronic case filing system. I hereby certify that I have served all counsel and/or pro se parties of record (or non-record) electronically by email or, as a pro-se party, on the date it is electronically docketed in the court's CM/ECF system, as authorized by the Federal Rule of Civil Procedure 5(b)(2) and the Local Rules of this Court (in the Northern and Eastern Districts of Texas).

Dated: Jan. 11, 2015

/s/Chelsea L. Davis
Chelsea L. Davis, *pro-se*